

SUE FAHAMI  
Acting United States Attorney  
District of Nevada  
Nevada Bar No. 5634

KARISSA D. NEFF  
Assistant United States Attorney  
Nevada Bar No. 9133  
501 Las Vegas Blvd. So., Suite 1100  
Las Vegas, Nevada 89101  
Phone: (702) 388-6336  
Karissa.Neff@usdoj.gov

*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Brandon Kotaniemi, individually and as special  
co-administrator of the Estate of Marsha  
Kotaniemi; Steven Kotaniemi, individually and  
as special co-administrator of the Estate of  
Marsha Kotaniemi,

,

Plaintiffs,

v.

Brian C. Ward, MD, an individual in his  
official capacity; Stephanie Martinez, MD,  
an individual in her official capacity; Emily  
Tibbits, MD, an individual; Lisa Angotti,  
MD an individual; State of Nevada ex rel  
The Board of Regents of the Nevada System  
of Higher Education ex rel the University of  
Nevada, Las Vegas, a political subdivision;  
DOE INDIVIDUALS I-X, inclusive; and  
ROE CORPORATIONS I-X, inclusive,

Defendants.

Case No. 2:25-cv-00540-APG-MDC

**Stipulation and Order for Extension of  
Time to Respond to Complaint**

**(FIRST REQUEST)**

Plaintiffs Brandon Kotaniemi and Steven Kotaniemi, through counsel and the  
United States of America, on behalf of federal defendants, Emily Tibbits, MD and Lisa  
Angotti, MD (“United States” and/or “Federal Defendant”), hereby stipulate and agree as  
follows:

2. Federal Defendant United States removed this case to the United States District Court, District of Nevada on March 24, 2025.

3. The current deadline for the United States to respond to Plaintiff's complaint is March 31, 2025.

4. Plaintiffs and the United States, through undersigned counsel, agree and stipulate that the United States' time to respond to Plaintiff's Complaint shall be extended through April 16, 2025.

5. The extension of time is necessary because counsel for the United States requires additional time to obtain and review the relevant information relating to the allegations in Plaintiffs' complaint.

Therefore, the parties request that the Court extend the deadline for the United States to respond to Plaintiffs' complaint through April 16, 2025.

This stipulated request is filed in good faith and not for the purpose of undue delay.

Respectfully submitted this 28th day of March 2025.

SUE FAHAMI  
Acting United States Attorney

THE POWELL LAW FIRM

/s/ Tom W. Stewart  
TOM W. STEWART  
8918 Spanish Ridge Avenue, Suite 100  
Las Vegas, Nevada 89148

*Attorney for Plaintiffs*

*/s/ Karissa D. Neff*  
 KARISSA D. NEFF  
 Assistant United States Attorney  
*Attorneys for Federal Defendants*

**IT IS SO ORDERED:**

Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge  
DATED: 4/1/2025